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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ANDREEA POP, Individually,  
  
Plaintiff,  
  
v.

UNITED STATES; U.S. DEPARTMENT  
OF HOMELAND SECURITY;  
TRANSPORTATION SECURITY  
ADMINISTRATION; DOES I  
through X; and ROE CORPORATIONS I  
through X, inclusive,  
  
Defendants.

Case No. 2:23-cv-01301-RFB-BNW

**Stipulation and Order to Extend  
Discovery Deadlines**

**(First Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. This stipulation is filed at least 21 days before the earliest deadline to be extended (amending pleadings and adding parties). The current deadline to amend pleadings and add parties is July 12, 2024. The parties have conducted discovery diligently and in good faith. However, unforeseen circumstances that are out of the parties' control necessitate the request for this extension. This is the first request for an extension of the discovery deadlines.

**DISCOVERY COMPLETED**

The parties have completed the following discovery:

1. Defendant made its initial disclosures on March 7, 2024.

1           2.     Plaintiff made her initial disclosures on March 7, 2024.

2           3.     Plaintiff served her first set of requests for production, and first set of  
3 interrogatories on Defendant on March 19, 2024.

4           4.     Defendant served its responses to Plaintiff's first set of requests for  
5 production, and first set of interrogatories on April 18, 2024.

6           5.     Plaintiff served her first set of requests for admission, second set of requests  
7 for production, and second set of interrogatories on Defendant on April 19, 2024.

8           6.     Defendant served its responses to Plaintiff's first set of requests for  
9 admission, second set of requests for production, and second set of interrogatories on May  
10 20, 2024.

11          7.     Defendant requested and Plaintiff provided HIPAA authorizations to allow  
12 Defendant to obtain Plaintiff's pertinent medical records.

13          8.     Plaintiff served her first supplement to initial disclosures of witnesses and  
14 documents on May 6, 2024.

15          9.     Defendant served its first supplement to initial disclosures of witnesses and  
16 documents on May 20, 2024.

17          10.    Defendant served its second supplement to initial disclosures of witnesses and  
18 documents on May 23, 2024.

19          11.    Plaintiff served her second supplement to initial disclosures of witnesses and  
20 documents on May 23, 2024.

21          12.    Defendant served its first set of requests for admission, first set of  
22 interrogatories and first set of requests for production on Plaintiff on May 30, 2024.

23          13.    Defendant took Plaintiff's deposition on June 4, 2024.

24          14.    Plaintiff served her third supplement to initial disclosures of witnesses and  
documents on June 5, 2024.

25          15.    Plaintiff took the depositions of TSA agents Bevan and Harris on June 18,  
26 2024.

27          16.    Plaintiff served her third set of interrogatories on Defendant on June 20, 2024.  
28

**DISCOVERY REMAINING**

Defendant intends to add another party to this lawsuit, which it believes had a responsibility to oversee the area where the accident happened. This additional time will allow Defendant to add the new party and effectuate service. Additionally, the parties are planning to schedule the depositions of several more TSA agents, which were present during Plaintiff's accident. Defendant is in the process of obtaining Plaintiff's medical records from her medical providers. The parties' initial and rebuttal expert disclosures remain to be completed.

The parties reserve the right to engage in any other discovery permitted by applicable rules and within the revised discovery deadlines if the court approves this stipulation.

**WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

Since the entry of the Scheduling Order (ECF No. 24), the parties have been working diligently to advance discovery. Defendant has recently identified a party that it believes is a necessary party to this lawsuit because it had responsibility to oversee the area where the accident with Plaintiff happened. The additional time requested will allow Defendant to add this party to the lawsuit. Additionally, Defendant is awaiting to receive Plaintiff's medical records from her treating providers which are based out of state.

The extension will allow the parties to address discovery issues and schedule and complete any remaining depositions.

The parties' counsel conferred and agreed that a sixty (60) day extension would be proper. The parties agree that neither party will be prejudiced by the proposed extension, and that they may be prejudiced should the current schedule remain in place. The parties agree the extension is sought in good faith.

**EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

The following table sets forth the current deadlines and the proposed sixty (60) day extension of discovery deadlines that are the subject of this stipulated request:

<b>SCHEDULED EVENT</b>	<b>CURRENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Amend Pleadings/Add Parties	July 12, 2024	<b>September 10, 2024</b>
Plaintiff's Expert Disclosure	July 12, 2024	<b>September 10, 2024</b>
Defendant's Expert Disclosure	August 12, 2024	<b>October 11, 2024</b>
Rebuttal Expert Disclosure	September 11, 2024	<b>November 11, 2024</b>
Discovery Cutoff	October 11, 2024	<b>December 10, 2024</b>
Dispositive Motions	November 12, 2024	<b>January 13, 2025</b>
Proposed Joint Pretrial Order	December 12, 2024	<b>February 10, 2025<sup>1</sup></b>

This request for an extension of time is not sought for any improper purpose including delay. This is the first request for an extension of discovery deadlines in this matter.

Respectfully submitted this 24th day of June 2024.

J. COGBURN LAW

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**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED:** 6/26/2024

<sup>1</sup> However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.